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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMES W. LESCINSKY
Plaintiff,

CASE NO:
2 :18-CV-01479-JAD-CWH

vs.

CLARK COUNTY SCHOOL DISTRICT, A
political subdivision of the State of Nevada, PAT
SKORKOWSKY, individually and in his official
capacity as Superintendent of Clark County School
District, TAMMY MALICH, individually and in
her capacity as Assistant Superintendent of Clark
County School District, MIKE BARTON,
individually and in his official capacity as Chief
Academic Officer of Clark County School District,
CLARK COUNTY SCHOOL DISTRICT
POLICE DEPARTMENT, A political subdivision
of the State of Nevada, JAMES KETSAA,
individually and in his capacity as Chief of Police
for Clark County School District Police
Department, CHRISTOPHER KLEMP,
individually and in his role as a Internal Affairs
Detective for Clark County School District Police
Department, KENNETH YOUNG, individually
and in his official capacity as a Police Captain for
the Clark County School District Police
Department, ROE and DOE SUPERVISORS, not
yet known,
Defendants.

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE PLAINTIFF'S
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS**

ECF No. 15

COMES NOW Plaintiff, JAMES LESCINSKY, by and through his attorney of record
MELVIN R. GRIMES, ESQ. of THE GRIMES LAW OFFICE, Defendants, CLARK COUNTY
SCHOOL DISTRICT, SKORKOWSKY, MALICH, BARTON, CLARK COUNTY SCHOOL
DISTRICT POLICE DEPARTMENT, KETSAA, and YOUNG by and through their attorney of

1 record, S. SCOTT GREENBERG ESQ., Senior Assistant General Counsel, Clark County School
2 District, and Defendant, CHRISTOPHER KLEMP, by and through his Attorney of Record, MARK
3 E. FERRARIO, ESQ. of GREENBERG TRAURIG, and hereby stipulate and make joint application
4 to extend the time for Plaintiff to file an Opposition to Defendant's Motion to Dismiss.

5 1. On October 10th 2018, the Defendants, CCSD, Skorkowsky, Malich, Barton, CCSDPD,
6 Ketsaa, and Young, by and through their attorney of record, S. Scott Greenberg, Esq., filed a
7 Motion to Dismiss.

8 2. On October 11th 2018, the Defendant, Christopher Klemm, by and through his attorney of
9 record, Mark E. Ferrario, filed Defendant Christopher Klemm's Motion to Dismiss and Joinder
10 to CCSD's Motion to Dismiss on October 11th 2018

11 3. The current due date for Plaintiff's Opposition to Motion to Dismiss and Plaintiff's Motion to
12 Dismiss and joinder to CCSD's Motion to Dismiss is October 25th 2018.

13 4. Attorney Grimes has a criminal trial in the Eighth Judicial District Court set for October 29-
14 November 2nd 2018 for which he must prepare for. As such, Counsel will be unable to prepare
15 and file Plaintiff's Opposition before the current due date

16 5. On October 24th 2018, Attorney Greenberg agreed to extend the due date for Plaintiff's
17 Opposition to Plaintiff's Motion to Dismiss by (10) days to November 3rd 2018. On October
18 25th 2018, Attorney Hendricks agreed to extend the due date for Plaintiff's Opposition to
19 Defendant Christopher Klemm's Motion to Dismiss and Joinder to CCSD's Motion to Dismiss.

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6. This is the first request for enlargement of time and it is made in good faith and not for purposes of delay.

THE GRIMES LAW OFFICE

**CLARK COUNTY SCHOOL DISTRICT-
OFFICE OF THE GENERAL COUNSEL**

/s/ Melvin R. Grimes

Melvin R. Grimes, Esq.

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Attorney for the Plaintiff

/s/ S. Scott Greenberg

S. Scott Greenberg, Esq.

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Phone: (702)799-5373

*Attorney for CCSD, Skorkowsky, Malich, Barton,
CCSDPD, Ketsaa, and Young*

GREENBERG TRAUIG

/s/ Kara Hendricks

Mark E. Ferrario, Esq.

Nevada Bar No.: 1625

Kara Hendricks, Esq.

Nevada Bar No.: 7743

Bethany Rabe, Esq.

Nevada Bar No.: 11691

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Attorneys for Christopher Klemp

IT IS SO ORDERED.



U.S. District Judge Jennifer A. Dorsey

Dated: October 25, 2018